

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MELODY DOMINGUEZ, STEPHANIE
HOLDREN, and all other Plaintiffs similarly
situated known and unknown,

Plaintiffs,

v.

QUIGLEY'S IRISH PUB, INC., NANCY
QUIGLEY, and MICHELLE MICHAEL,
individually,

Defendants.

No. 09 CV 2583

Magistrate Judge Cole

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND COSTS

Plaintiff Melody Dominguez, by and through her attorneys, Caffarelli & Siegel Ltd., respectfully moves this Court to award her \$98,872.50 in reasonable attorneys' fees, and \$3,943.07 in recoverable, non-taxable expenses pursuant to 29 U.S.C. § 216(b), 820 Ill. Comp. Stat. 105/12(a), and Local Rule 54.3.

On July 11, 2011, the parties attended a settlement conference with the Court. (D.E. 84.) At the conclusion of the settlement conference, the Court approved the parties' settlement agreement, a condition of which included the filing of a fee petition and Defendants paying her reasonable attorneys' fees and costs in an amount determined by the Court. (D.E. 84.) Through the instant Motion, Dominguez seeks the award of her attorneys' fees and costs.

In support of this Motion, Dominguez submits an accompanying Memorandum of Law with multiple supporting exhibits. For the reasons set forth in the accompanying Memorandum of Law, Dominguez seeks \$98,872.50 in reasonable attorneys' fees, and \$3,943.07 in costs and expenses.

WHEREFORE, Plaintiff Melody Dominguez respectfully requests that this Honorable Court grant her motion for attorneys' fees and cost, and grant her all other relief deemed just.

Dated: September 19, 2011

Respectfully submitted,

MELODY DOMINGUEZ

By: /s/ Bradley Manewith
Attorney for Plaintiff

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Bradley Manewith
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the attached, Plaintiff's Motion for Attorneys' Fees and Costs, to be served upon the parties below by electronically filing with the Clerk of the U.S. District Court of the Northern District of Illinois on September 19, 2011.

Mr. Jeffry J Knuckles
Nyberg & Cassioppi, LLC
1111 S. Washington St.
Naperville, IL 60540

Mr. James A. McGurk
Law Offices of James A. McGurk, P.C.
10 S. LaSalle St., Suite 3300
Chicago, IL 60603

Courtesy copy delivered to chambers of Magistrate Judge Cole within 24 hours of filing.

/s/ Bradley Manewith
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